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Attorneys for Defendant Joaquin Q. Atalig

**IN THE UNITED STATES DISTRICT COURT
 FOR THE
 NORTHERN MARIANA ISLANDS**

DONGBU INSURANCE COMPANY, LTD.,)	CIVIL ACTION NO. CV 08-0002
)	
Plaintiff,)	
)	
vs.)	CASE MANAGEMENT CONFERENCE
)	STATEMENT OF DEFENDANT
OKP (CNMI) CORPORATION AND)	JOAQUIN Q. ATALIG
JOAQUIN Q. ATALIG,)	
)	
Defendants.)	

Defendant Joaquin Q. Atalig, by and through counsel, hereby submits his Case Management Conference Statement pursuant to LR 16.2CJe2 as follows:

- (a) **Service of process on parties not yet served.** All named parties were served.
- (b) **Jurisdiction and venue.** The Court has jurisdiction pursuant to 28 U.S.C. § 1332(a) because the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs,

1 and citizens of a State and a citizen or subject of a foreign state. This Court also has jurisdiction
2 pursuant to 28 U.S.C. § 2201 and FED.R.CIV.P. 57 with respect to declaratory judgments and
3 declaratory relief provided therein for the purpose of determining a question of actual
4 controversy between the parties.

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6 Venue is proper in the United States District Court for the Northern Mariana Islands.

7 **(c) Track assignment.** Mr. Atalig agrees with the Court that this case should be
8 assigned to the Standard Track as defined in LR 16.2CJe.

9 **(d) Anticipated motions.** Mr. Atalig anticipates filing a motion for summary judgment
10 and/or a joinder to Defendant OKP's motion, if any and if applicable.

11
12 **(e) Anticipated or remaining discovery, including (1) limitation on discovery, (2)**
13 **and provisions for disclosure or discovery of electronically stored information, and, (3) any**
14 **agreements the parties reach for asserting claims of privilege or of protection as trial-**
15 **preparation material after production.** The parties have yet to conduct any formal discovery
16 in this action.

17
18 **(f) Further proceedings, including setting dates for discovery cut-off, pretrial and**
19 **trial.** Mr. Atalig will be ready to discuss dates at the conference.

20 **(g) Appropriateness of special procedures such as consolidation of actions for**
21 **discovery or pretrial, reference to a master or to arbitration or to the Judicial Panel or**
22 **Multidistrict Litigation, or application of the Manual for Complex Litigation.** None.

23
24 **(h) Modifications of the standard pretrial procedures specified by the Local Rules**
25 **on account of the relative simplicity or complexity of the action or proceeding.** None.

26 **(i) Settlement prospects.** Mr. Atalig is amenable to a fair and reasonable settlement.
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1 (j) Any other matter which may be conducive to the just, efficient and economical
2 determination of the proceeding, including the definition or limitation of issues. None at
3 this time.
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7 Dated: April 24, 2008

Respectfully submitted,

8 O'CONNOR BERMAN DOTTS & BANES

9 /s/

10 Michael W. Dotts, Esq. (F0150)
11 Attorneys for Plaintiff

12 Dated: April 24, 2008

LAW OFFICES OF RAMON K. QUICHOCHO, LLC

14 /s/

15 Ramon K. Quichocho, Esq. (F0243)
16 Attorney for Plaintiff
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